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Attorneys for Plaintiff and
 Counterclaim-Defendant Leadership Studies, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

LEADERSHIP STUDIES, INC., a
 California corporation,

 Plaintiff,

 v.

 BLANCHARD TRAINING AND
 DEVELOPMENT, INC., a California
 corporation, and Does 1-10, inclusive,

 Defendants.

BLANCHARD TRAINING AND
 DEVELOPMENT, INCORPORATED,

 Counterclaim-Plaintiff,

 v.

 LEADERSHIP STUDIES, INC.,

 Counterclaim-Defendant.

CASE NO. 15CV1831 WQH-KSC

**SUPPLEMENTAL DECLARATION
 OF JEFFREY J. ZUBER RE:
 EXTENSION TO FILE JOINT
 MOTION FOR DETERMINATION
 OF DISCOVERY DISPUTE ON
 PLAINTIFF'S REQUESTS FOR
 PRODUCTION 73-78**

*No Oral Argument Unless Requested
 By The Court*

[Filed Concurrently with Joint Motion
 for Determination of Discovery Dispute
 on Plaintiff's Requests for Production
 73-78]

Case No. 15CV1831 WQH-KSC

DECLARATION OF NATHANIEL L. FINTZ IN SUPPORT OF JOINT MOTION FOR DETERMINATION OF
 DISCOVERY DISPUTE ON PLAINTIFF'S REQUESTS FOR PRODUCTION 73-78

DECLARATION OF JEFFREY J. ZUBER

I, Jeffrey J. Zuber, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Zuber Lawler & Del Duca LLP, attorneys of record for Leadership Studies, Inc. ("CLS"). I have personal knowledge of the facts stated herein and, if called to testify, I could competently do so.

2. The original extended date to file this joint motion for determination of a discovery dispute was April 17, 2017. *See* Fintz Decl. at ¶ 33, Exh. 25.

3. On April 17, 2017, counsel for Blanchard Training and Development, Inc. ("BTD") requested an additional day, beyond the five day minimum afforded for a response, to serve their responsive portion of the current joint motion, and BTD represented that the extra day would not affect the deadline on filing this joint discovery motion with the Court. Counsel for CLS agreed to allow the additional day along with a corresponding extra day to file this joint discovery motion.

4. On the following day, April 18, 2017, counsel for BTD served their portion of the joint discovery motion as promised.

5. However, BTD's counsel was not available to serve its signed portion of the certificate of compliance Pursuant to Local Rule 26.1(b) and Rule V(D) of the Rules of the Hon. Karen S. Crawford, U.S.M.J. BTD requested that they serve the signature on the following day, and CLS agreed. The parties agreed that the motion to compel deadline would be moved accordingly.

6. On the following day, April 19, 2017, BTD served its portion of the signed statement as promised.

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4 I declare under penalty of perjury under the laws of the United States of
5 America that the foregoing is true and correct.

6 Executed on this 19th day of April, 2017, at Los Angeles, California.

Jeffrey J. Zuber